

[counsel listed on following page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DE VRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
TO PLAINTIFF'S FIRST REQUESTS  
FOR PRODUCTION TO ALL  
DEFENDANTS**

**[N.D. CAL. CIV. L.R. 6-2]**

STIPULATION TO EXTEND DEADLINE TO  
RESPOND TO PLAINTIFF'S FIRST  
REQUESTS FOR PRODUCTION TO ALL  
DEFENDANTS [4:22-CV-05990-HSG]

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Defendants Kirkland & Ellis LLP (“K&E”), Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, “Defendants”) and Plaintiff Zoya Kovalenko (“Plaintiff”) (Plaintiff and Defendant collectively, the “Parties”), hereby stipulate pursuant to Civil Local Rule 6-2 as follows:

WHEREAS, Plaintiff served her First Requests for Production to All Defendants (the “Requests”) on April 20, 2024;

WHEREAS, the current deadline for Defendants to respond to the Requests is May 20, 2024;

WHEREAS, it is Defendants' position that Plaintiff should have served document requests on each Defendant individually rather than on all eight (8) Defendants, collectively, and Plaintiff disagrees.

WHEREAS, Defendants require additional time to respond to the 68 Document Requests on behalf of each of the eight (8) Defendants;

WHEREAS, the Parties agree to extend the deadline for Defendants to respond to the Requests until June 19, 2024;

WHEREAS, the previous time modifications in this case are as follows:

- A stipulation to specially set the briefing schedule on nine of Defendants’ motions filed in response to Plaintiff’s Complaint was filed on December 20, 2022 (Dkt. 43) and granted on December 21, 2022 (Dkt. 44).
- A stipulation to extend deadlines to comply with initial discovery obligations pursuant to General Order No. 71 and to set the briefing schedule for K&E’s Anti-SLAPP Motion was filed on January 9, 2023 (Dkt. 59) and granted on January 10, 2023 (Dkt. 61).
- A stipulation under Civil Local Rule 6-1(a) to extend time for Plaintiff to object/respond to K&E’s First Sets of Interrogatories and Requests for Production from September 7, 2023 to October 9, 2023 was filed on August 30, 2023 (Dkt. 93).
- A stipulation under Civil Local Rule 6-2 to extend time for Defendants to answer

Plaintiff's First Amended Complaint was filed on September 26, 2023 (Dkt. 95) and granted on September 27, 2023 (Dkt. 96).

- A stipulation under Civil Local Rule 6-1(a) to extend time for Plaintiff to object/respond to K&E's First Sets of Interrogatories and Requests for Production from October 9, 2023 to November 8, 2023 was filed on October 6, 2023 (Dkt. 100).
- A stipulation under Civil Local Rules 6-1(b) and 6-2 to extend time regarding Defendants' Motion to Dismiss Plaintiff's First Amended Complaint was filed on October 27, 2023 (Dkt. 104) and granted on October 30, 2023 (Dkt. 106).
- A stipulation under Civil Local Rule 6-2 to specially set a briefing schedule on Plaintiff's motion to quash and to reset hearing dates was filed on December 27, 2023 (Dkt. 114) and was granted on December 28, 2023 (Dkt. 115).

WHEREAS, the brief extension of time requested here would have no effect on the schedule for this case as no case schedule has yet been entered.

IT IS HEREBY STIPULATED by the Parties that the deadline for Defendants to file a response to the Requests is extended to June 19, 2024.

Respectfully submitted,

Dated: May 9, 2024

MARK R. THOMPSON  
Orrick, Herrington & Sutcliffe LLP

By: /s/ Mark R. Thompson  
Mark R. Thompson  
(Admitted *pro hac vice*)  
Attorneys for Defendants

Dated: May 9, 2024


TANVIR H. RAHMAN  
Filippatos PLLC

By: /s/ Tanvir H. Rahman  
TANVIR H. RAHMAN  
(Admitted *pro hac vice*)  
Attorneys for Plaintiff

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/9/2024

  
HAYWOOD S. GILLIAM, JR.  
United States District Judge

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